

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

UNITED STATES OF AMERICA,

v.

ANDREW ROXROY SEYMOUR,
ZIGGY DWAYNE TYRON BENJAMIN,
KESTER CLAUDIUS JULIEN,
ODLAND GUYELMO DE COTEAU, and
WELCOME JEFFREY KING,

Defendants.

CRIMINAL COMPLAINT

MAGISTRATE NO. 2011 - 516

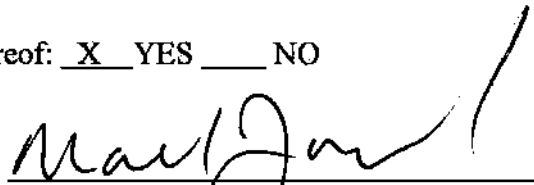
I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about September 19, 2011, while aboard a vessel subject to the jurisdiction of the United States, the defendants, **ANDREW ROXROY SEYMOUR, ZIGGY DWAYNE TYRON BENJAMIN, KESTER CLAUDIUS JULIEN, ODLAND GUYELMO DE COTEAU, and WELCOME JEFFREY KING**, did knowingly and willfully combine, conspire, and agree with each other and with other persons known and unknown, to possess with the intent to distribute five (5) kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 46, United States Code, Sections 70503(a)(1).

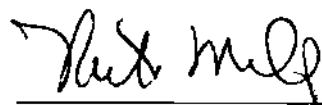
I further state that I am a Task Force Agent with the Drug Enforcement Administration and that this Complaint is based on the following:

SEE ATTACHED AFFIDAVIT, INCORPORATED HEREIN BY REFERENCE.

Continued on the attached sheet and made a part hereof: X YES ___ NO


Mark Joseph, Task Force Agent
Drug Enforcement Administration

Sworn to before me and subscribed in my presence this 21st day of September, 2011, at St. Thomas, U.S. Virgin Islands.

A handwritten signature in black ink, appearing to read "Ruth Miller", written over a horizontal line.

Ruth Miller

United States Magistrate Judge